

**BOIES SCHILLER FLEXNER LLP**

David Boies (admitted pro hac vice)  
333 Main Street  
Armonk, NY 10504  
Tel: (914) 749-8200  
dboies@bsfllp.com

Mark C. Mao, CA Bar No. 236165  
Beko Reblitz-Richardson, CA Bar No. 238027  
44 Montgomery St., 41st Floor  
San Francisco, CA 94104  
Tel.: (415) 293-6800  
mmao@bsfllp.com  
brichardson@bsfllp.com

James Lee (admitted pro hac vice)  
Rossana Baeza (admitted pro hac vice)  
100 SE 2nd St., 28th Floor  
Miami, FL 33131  
Tel.: (305) 539-8400  
jlee@bsfllp.com  
rbaeza@bsfllp.com

Alison L. Anderson, CA Bar No. 275334  
M. Logan Wright, CA Bar No. 349004  
725 S. Figueroa St., 31st Floor  
Los Angeles, CA 90017  
Tel.: (213) 629-9040  
alanderson@bsfllp.com

*Attorneys for Plaintiffs; additional counsel listed in  
signature blocks below*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER CASTILLO,  
and MONIQUE TRUJILLO, individually and on  
behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

**QUINN EMANUEL URQUHART &  
SULLIVAN, LLP**

Andrew H. Schapiro (*pro hac vice*)  
andrewschapiro@quinnemanuel.com  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
Telephone: (312) 705-7400  
Facsimile: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)  
stephenbroome@quinnemanuel.com  
Viola Trebicka (CA Bar No. 269526)  
violatrebicka@quinnemanuel.com  
Crystal Nix-Hines (CA Bar No. 326971)  
crystalnixhines@quinnemanuel.com  
Rachael L. McCracken (CA Bar No. 252660)  
rachaelmccracken@quinnemanuel.com  
Alyssa G. Olson (CA Bar No. 305705)  
alyolson@quinnemanuel.com  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100

*Attorneys for Defendant; additional counsel  
listed in signature blocks below*

Case No.: 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION RE:  
PLAINTIFFS' REQUEST TO COMPEL  
LIVE TESTIMONY FROM MS.  
BORSAY AND MR. HALAVATI AT  
TRIAL**

Judge: Hon. Yvonne Gonzalez Rogers

Trial Date: January 29, 2024

1 Pursuant to Civil Local Rule 7-12, this joint stipulation is entered into between Plaintiffs and  
2 Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, at the Pretrial Conference on November 29, 2023, the Parties informed the  
4 Court of a dispute as to whether Google could or should be compelled to make Ms. Sabine Borsay—  
5 a current Google employee who is a German citizen and resides in Germany—available to testify  
6 live at trial. *See* PTC Tr. 29:10–30:20.

7 WHEREAS, at the Pretrial Conference, the Parties also informed the Court of a similar  
8 dispute as to whether Google could or should be compelled to make Mr. Ramin Halavati—a current  
9 Google employee who is a non-U.S. citizen and resides in Germany—available to testify live at trial.  
10 *See* PTC Tr. 31:7–32:5.

11 WHEREAS, on December 4, 2023, the Court issued Pretrial Order No. 1, directing the  
12 Parties to “provide briefing not to exceed three pages with respect to the appearance of witnesses  
13 Sabine Borsay and Ramin Halavati” and travel information for both witnesses. Dkt. 1076 ¶ 7.

14 WHEREAS, at the Pretrial Conference, Plaintiffs declined the Court’s invitation to brief the  
15 issue of whether Google should be compelled to make Mr. Ramin Halavati available to testify live  
16 at trial and agreed to withdraw their request that he testify live. *See* PTC Tr. 32:18–20.

17 WHEREAS, in the interest of conserving judicial resources and resolving pretrial disputes  
18 without Court involvement, Plaintiffs and Google agree that Ms. Sabine Borsay will not testify live  
19 at trial.

20 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties as  
21 follows:

22 1. Plaintiffs will withdraw their request that the Court compel Google to make Mr. Ramin  
23 Halavati or Ms. Sabine Borsay available to testify live at trial.

24 2. The Parties accordingly agree not to file briefing on whether Google can or should be  
25 compelled to make Mr. Ramin Halavati and/or Ms. Sabine Borsay available to testify live at trial,  
26 whether in person or remotely, or submit the travel information for those witnesses ordered in  
27 connection with that briefing.

3. The Parties reserve all other rights with respect to these witnesses.

Dated: December 12, 2023

BOIES SCHILLER FLEXNER LLP

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

*/s/ Mark C. Mao*

*/s/ Andrew H. Schapiro*

Mark C. Mao (CA Bar No. 236165)  
mmao@bsflp.com

Andrew H. Schapiro (admitted *pro hac vice*)  
andrewschapiro@quinnemanuel.com

Beko Reblitz-Richardson (CA Bar No. 238027)  
brichardson@bsflp.com

Teuta Fani (admitted *pro hac vice*)  
teutafani@quinnemanuel.com

44 Montgomery Street, 41<sup>st</sup> Floor  
San Francisco, CA 94104

Joseph H. Margolies (admitted *pro hac vice*)  
josephmargolies@quinnemanuel.com

Tel: (415) 293 6858

191 N. Wacker Drive, Suite 2700

Fax: (415) 999 9695

Chicago, IL 60606

James W. Lee (*pro hac vice*)

Tel: (312) 705-7400

jlee@bsflp.com

Fax: (312) 705-7401

Rossana Baeza (*pro hac vice*)

Stephen A. Broome (CA Bar No. 314605)

rbaeza@bsflp.com

stephenbroome@quinnemanuel.com

100 SE 2<sup>nd</sup> Street, Suite 2800

Viola Trebicka (CA Bar No. 269526)

Miami, FL 33130

violatrebicka@quinnemanuel.com

Tel: (305) 539-8400

Crystal Nix-Hines (Bar No. 326971)

Fax: (305) 539-1304

crystalnixhines@quinnemanuel.com

Rachael L. McCracken (CA Bar No. 252660)

Alison L. Anderson (CA Bar No. 275334)

rachaelmccracken@quinnemanuel.com

alanderson@bsflp.com

Alyssa G. Olson (CA Bar No. 305705)

M. Logan Wright (CA Bar No. 349004)

alyolson@quinnemanuel.com

mwright@bsflp.com

865 S. Figueroa Street, 10th Floor

BOIES SCHILLER FLEXNER LLP

Los Angeles, CA 90017

725 S. Figueroa St., 31st Floor

Tel: (213) 443-3000

Los Angeles, CA 90017

Fax: (213) 443-3100

Telephone: (213) 629-9040

Facsimile: (213) 629-9022

Diane M. Doolittle (CA Bar No. 142046)

dianedoolittle@quinnemanuel.com

Bill Carmody (*pro hac vice*)

Sara Jenkins (CA Bar No. 230097)

bcarmody@susmangodfrey.com

sarajenkins@quinnemanuel.com

Shawn J. Rabin (*pro hac vice*)

555 Twin Dolphin Drive, 5th Floor

srabin@susmangodfrey.com

Redwood Shores, CA 94065

Steven Shepard (*pro hac vice*)

Telephone: (650) 801-5000

sshepard@susmangodfrey.com

Facsimile: (650) 801-5100

Alexander P. Frawley (*pro hac vice*)

Jomaire A. Crawford (admitted *pro hac vice*)

afrawley@susmangodfrey.com

jomairecrawford@quinnemanuel.com

SUSMAN GODFREY L.L.P.

D. Seth Fortenbery (admitted *pro hac vice*)

1301 Avenue of the Americas, 32<sup>nd</sup> Floor

sethfortenbery@quinnemanuel.com

New York, NY 10019

51 Madison Avenue, 22nd Floor

Tel: (212) 336-8330  
 Amanda Bonn (CA Bar No. 270891)  
 abonn@susmangodfrey.com  
 SUSMAN GODFREY L.L.P.  
 1900 Avenue of the Stars, Suite 1400  
 Los Angeles, CA 90067  
 Tel: (310) 789-3100

John A. Yanchunis (*pro hac vice*)  
 jyanchunis@forthepeople.com  
 Ryan J. McGee (*pro hac vice*)  
 rmcgee@forthepeople.com  
 MORGAN & MORGAN, P.A.  
 201 N. Franklin Street, 7th Floor  
 Tampa, FL 33602  
 Tel: (813) 223-5505  
 Fax: (813) 222-4736

Michael F. Ram (CA Bar No. 104805)  
 mram@forthepeople.com  
 MORGAN & MORGAN, P.A.  
 711 Van Ness Avenue, Suite 500  
 San Francisco, CA 94102  
 Tel: (415) 358-6913

*Attorneys for Plaintiffs*

New York, NY 10010  
 Telephone: (212) 849-7000  
 Facsimile: (212) 849-7100

Carl Spilly (admitted *pro hac vice*)  
 carlspilly@quinnemanuel.com  
 Xi ("Tracy") Gao (CA Bar No. 326266)  
 tracygao@quinnemanuel.com  
 1300 I Street NW, Suite 900  
 Washington D.C., 20005  
 Tel: (202) 538-8000  
 Fax: (202) 538-8100

Jonathan Tse (CA Bar No. 305468)  
 jonathantse@quinnemanuel.com  
 50 California Street, 22nd Floor  
 San Francisco, CA 94111  
 Tel: (415) 875-6600  
 Fax: (415) 875-6700

*Attorneys for Defendant Google LLC*

### **ATTESTATION OF CONCURRENCE**

I, Mark Mao, am the ECF user whose ID and password are being used to file JOINT STIPULATION RE: CERTAIN REFERENCES TO INCOGNITO AND TWO PLAINTIFFS' BACKGROUNDS. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: December 12, 2023

By /s/ Mark C. Mao

Mark C. Mao

*Counsel on behalf of Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER CASTILLO,  
and MONIQUE TRUJILLO, individually and on  
behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER ENTERING  
STIPULATION**


Judge: Hon. Yvonne Gonzalez Rogers

Trial Date: January 29, 2024

**~~PROPOSED~~ ORDER**

Pursuant to stipulation of the Parties, the Court hereby **ENTERS** the stipulation.

DATED: December 13, 2023

  
HON. YVONNE GONZALEZ ROGERS  
United States District Judge